

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Governor Jesse Ventura, a/k/a James G.
Janos, an individual,

Civil No. 0:12-cv-00472

Plaintiff,

DECLARATION OF KEVIN LACZ

vs.

Chris Kyle, an individual,

Defendant.

I, Kevin Lacz, do state that the following facts are true and correct to the best of my knowledge and belief:

1. I provide this Declaration based on my personal knowledge and information and do so from my state of residence in the State of Connecticut.
2. I was an active-duty Navy SEAL between June 2004 and December 2008 or January 2009. Chris Kyle and I were in the same platoon on two separate combat tours: one in Ramadi, Iraq, beginning in 2006 and one in Al-Qaim, Iraq, beginning in 2008. I first met Chris in March 2005.
3. I have read parts of Chris's book *American Sniper*, and I am familiar with the passage found at pages 310–12 of the book under the heading "Punching out Scruff Face."

4. That passage describes an incident between Chris and an individual he calls "Scruff Face." I was with Chris when that incident happened. I know that "Scruff Face" refers to Jesse Ventura. The incident took place at a bar called McP's Irish Pub & Grill in Coronado, California.
5. Chris and I and several other SEALs and their family members were at McP's to mourn Mikey Monsoor, who had been killed in Iraq.
6. I recall that I arrived at McP's before Chris did. I cannot recall when I first saw Ventura, but I know he was there. I was at McP's most of the afternoon and into the evening.
7. As Chris states in his book, I recall that he attempted to introduce Ryan Job, who had been injured in Iraq, to Ventura. Ventura blew them off.
8. I never spoke to Ventura. I did not wish to speak to him because I did not and do not have a high opinion of him.
9. Throughout the afternoon and evening, I observed Ventura acting inappropriately and addressing individuals in a condescending manner. I heard him make comments that were offensive and insensitive to Mikey's friends and family, all of whom were at McP's mourning his death.
10. I don't remember word-for-word the comments that Ventura made, but his general theme was that SEALs had it coming when members of their teams were killed in combat in Iraq.

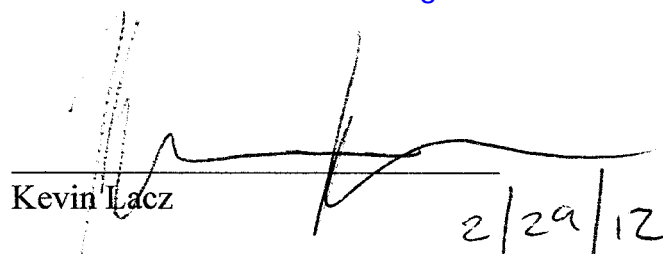
11. Later in the evening, it may have been around 8:30 or 9 p.m., I saw Chris in Ventura's vicinity. They were talking relatively closely and I could not hear what they were saying over the din of the crowd. I looked away for a minute, and I did not see Chris hit, punch, or shove Ventura. However, when I turned back, I saw that Ventura was on the ground and that the Chris was making his way out the door.

12. I did not hear Ventura say "You deserve to lose a few" immediately before I saw Ventura on the ground. As I said, I could not hear what Chris and Ventura were saying, because of the din of the crowd. However, Ventura had been making similar statements throughout the day.

13. I have always found Chris to be an honest person and I have no reason to doubt that he is telling the truth when he says that Ventura said "You deserve to lose a few" and when he says that Ventura swung at Chris before Chris "laid him out," as described in the book.

I certify under penalty of perjury that the foregoing is true and correct to the best of my personal knowledge and belief.

Dated at Middlefield, Connecticut, this 29 day of February, 2012.



Kevin Lacz

2/29/12